

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

---

In re:

MLCJR LLC, *et al.*,<sup>1</sup>

Debtors

---

)  
) Chapter 7  
)  
) Case No. 23-90324 (CML)  
)  
) Jointly Administered  
)  
)

NOTICE OF REVISED FORM OF PROPOSED ORDER AND RESOLUTION OF  
INFORMAL OBJECTION TO EMERGENCY MOTION FOR THE ENTRY OF AN  
ORDER (I) APPROVING THE TRUSTEE’S ENTRY INTO THE PURCHASE  
AGREEMENT, (II) AUTHORIZING THE SALE OF ESTATE PROPERTY FREE  
AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES,  
(III) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT  
OF EXECUTORY CONTRACTS, AND  
(IV) GRANTING RELATED RELIEF

[Related Docket No. 2383]

The undersigned hereby certifies as follows:

1. On February 25, 2025, Michael D. Warner, solely in his capacity as chapter 7 trustee for the above-captioned administratively consolidated estates, filed that certain *Emergency Motion for the Entry of an Order (I) Approving the Trustee’s Entry into the Purchase Agreement, (II) Authorizing the Sale of Estate Property Free and Clear of All Liens, Claims, Interests, and Encumbrances, (III) Authorizing the Assumption and Assignment of Executory Contracts, and (IV) Granting Related Relief* [Doc. No. 2383] (the “Motion”).<sup>2</sup>

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors’ address is 4514 Cole Ave, Suite 1175, Dallas, Texas 75205.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

2. A hearing on the Motion is scheduled for March 6, 2025 at 11:00 a.m. (prevailing Central Time) before Judge Christopher M. Lopez in Courtroom 401, 515 Rusk, Houston, TX 77002.

3. Two parties, TGS-NOPEC Geophysical Company (“TGS”) and Danos L.L.C. (“Danos”), contacted the Trustee regarding the Motion.

4. Undersigned counsel to the Trustee has resolved TGS’ informal comments to the Proposed Order and hereby certifies that such comments have been resolved by the attached form of order (the “Revised Proposed Order”).

5. Danos presented questions but did not formally or informally object to entry of the Proposed Order.

6. The Trustee hereby certifies that there are no known objections to entry of the Revised Proposed Order.

7. Attached hereto in advance of the hearing are (a) a redline of the Revised Proposed Order against the Proposed Order (attached hereto as Exhibit A); and (b) a clean copy of the Revised Proposed Order (attached hereto as Exhibit B).

Dated: March 6, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN & ALTAZAN, LLC**

By: /s/ Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
William S. Robbins (Tx. Bar # 24100894)  
[wrobbins@stewartrobbins.com](mailto:wrobbins@stewartrobbins.com)  
301 Main Street, Suite 1640  
Baton Rouge, LA 70801-0016  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467

***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing pleading was caused to be served upon all parties that are registered to receive electronic service through the court's ECF notice system in the above case on this 6th day of March 2025.

/s/ Paul Douglas Stewart, Jr. \_\_\_\_\_  
Paul Douglas Stewart, Jr.